



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

March 10, 2021

**BY ECF**

The Honorable Paul A. Crotty  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street, New York, New York 10007

3/16/2021

The proposed schedule is  
adopted. SO ORDERED.

**Re: United States v. Dacheng Zhen, et al., 20 Cr. 56 (PAC)**

Dear Judge Crotty:

The Government writes to request that the Court enter a pre-trial scheduling order for remaining pretrial motions, motions in limine, expert notices, requests to charge, and voir dire, in advance of the trial scheduled to begin on April 20, 2021. The Government proposes the following dates:

Edward Hernandez Pretrial Motions Due:	March 26, 2021
Expert Notices Due:	March 26, 2021
Government's Response to Mr. Hernandez's Pretrial Motions:	April 2, 2021
Motions in Limine Due:	April 2, 2021
Voir Dire Due:	April 2, 2021
Requests to Charge Due:	April 2, 2021
Responses to Motions in Limine Due:	April 9, 2021

The Government has conferred with defense counsel, and defense counsel do not consent to the Government's proposals, and have not counter-proposed different deadlines.<sup>1</sup>

Respectfully submitted,

AUDREY STRAUSS  
United States Attorney

By:   
Aline R. Flodr/Stephanie Lake/Sheb Swett  
Assistant United States Attorneys  
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cc: All counsel (by ECF)

<sup>1</sup> Defense counsel for Edward Hernandez consents in part to the proposed schedule in that he consents to the due date for his pretrial motions and the Government's response thereto.